



United States Department of the Interior

FISH AND WILDLIFE SERVICE

P.O. Drawer 1190
Daphne, AL 36526

January 29, 1992



3 2 1230

3600

Mr. Kenneth A. Lucas
Remedial Project Manager
South Superfund Remedial Branch
United States Environmental Protection Agency
Region 4
345 Courtland Street. N.E.
Atlanta, Georgia 30365

Dear Mr. Lucas:

We have reviewed the Revised Sampling and Analysis Plan, Macroinvertebrate Study and Fish Sampling, October 1991 for the Olin Corporation (Olin) McIntosh Plant Site and have the following comments.

We note that the study design continues to delete the Tombigbee River. It has consistently been our position that the river should be included in the investigation. This rationale is justified because of the contiguous relationship between the basin and the river during annual high river stages and the fact that elevated mercury levels have been found in fish collected in the river near the Olin facility.

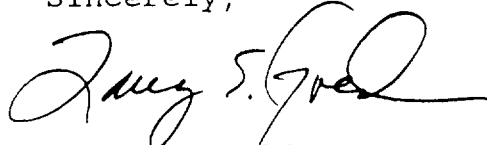
It has been Olin's position that the study would employ a progressive approach with the river being sampled only if elevated mercury was found in the basin. Our principal objection has been the time delay in amassing the data using this tiered approach. Data presently exists that already demonstrates high mercury levels in sediments and fish in the basin as well as high mercury levels in fish in the river. This data should be adequate to justify an expanded investigation to determine the area extent of mercury contamination.

The selection of largemouth bass is an excellent choice to evaluate mercury uptake through the foodchain. It has been our experience that this species contains the highest residue levels found in the river. The plan states that the scales will be removed prior to analysis. Since this is not a part of our protocol we would be interested in the consultants rationale for this procedure.

Again, we reiterate our position that the Fish and Wildlife Service's trust resource responsibilities cannot be properly evaluated until the question of mercury contamination in the Tombigbee River adjacent to the Olin facility has been completely addressed.

3 2 1240

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry E. Goldman".

Larry E. Goldman
Field Supervisor